1 2 3 4	JULIA JAYNE (State Bar No. 202753) ASHLEY RISER (State Bar No. 320538) JAYNE LAW GROUP, P.C. 803 Hearst Ave. Berkeley, Ca 94710 Telephone: (415) 623-3600 Email: ashley@jaynelawgroup.com					
5	Attorney for Defendant					
6	JUAN ĎAGIO					
7	UNITED STATES DISTRICT COURT					
8	NORTHERN DISTRICT OF CALIFORNIA					
9	SAN FRANCISCO					
10						
11	UNITED STATES OF AMERICA,	Case No. CR 20-00431 VC [TSH]				
12	Plaintiff,	JUAN DAGIO'S EX PARTE APPLICATION FOR ORDER				
13	v.	PERMITTING MODIFICATION TO TRAVEL RESTRICTIONS; [PROPOSED]				
14	JUAN DAGIO,  ORDER					
15	Defendant.					
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17	I, Ashley Riser, declare:					
18	1. I represent Defendant Juan Dagio in the above-entitled matter. He is currently on					
19	pretrial release with an unsecured \$10,000 bond. His release conditions also					
20	require him to reside at the halfway house located 111 Taylor Street ("the halfway					
21	house"). Dkt. 109. The purpose of this application is to respectfully request that					
22	Mr. Dagio's pretrial conditions are modified as follows to permit him to:					
23	a. Leave the halfway house from 4:30 PM to 10:30 PM on April 15, 2022 to					
24	attend a church event; and					
25	b. Leave the halfway house every Sunday from 9:00 AM to 12:45 PM to attend					
26	regular church services.					
27	2. Defense counsel contacted Pre	etrial Services regarding this request, and Mr.				
28	EV DADTE ADDI ICATION, IDDODOSEDI ORDER					
	EX PARTE APPLICATION; [PROPOSED] ORDER CASE NO. CR 20-00431 VC [TSH]					

Dagio's Pretrial Services Officer, Officer Josh Libby, does not object. Further,					
defense counsel provided Officer Libby with all pertinent contact information,					
	travel details, and event information.				
3.	Assistant United States Attorney Barbara Valliere does not object to this request.				
4.	Based on the foregoing, I respectfully request that the conditions of Mr. Dagio's				
	release be modified to allow him to leave the halfway house on April 15, 2022 to				
	attend a church event. Further, I respectfully request that the conditions of Mr.				
Dagio's release be modified to allow him to leave the halfway house every Sunday					
morning to attend regular church services.					
5. All other conditions of release shall remain the same.					
I declare under penalty of perjury under the laws of the United States that the foregoing is					
true and correct.					
16 DATED: Amil 11, 2022				/a/	
DATED. Api	.1 11, 2022	Dy.	Barbara Valliere		
			Assistant Office	States Attorney	
DATED: An	oril 11, 2022 E	D <sub>vv</sub> .		la!	
DATED. Ap.		Dy.	Ashley Riser		
			Counsel for JOA	IN DAGIO	
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	4.  5.  I decl true and corr  DATED: Apr	defense counsel protection travel details, and etails, and etails, and etails, and etails.  3. Assistant United States and the foregoing release be modified attend a church even Dagio's release be morning to attend a state attend a	defense counsel provided Office travel details, and event inform  3. Assistant United States Attorned  4. Based on the foregoing, I respected release be modified to allow him attend a church event. Further, Dagio's release be modified to morning to attend regular church  5. All other conditions of release and true and correct.  DATED: April 11, 2022 By:	defense counsel provided Officer Libby with all travel details, and event information.  3. Assistant United States Attorney Barbara Vallier  4. Based on the foregoing, I respectfully request the release be modified to allow him to leave the hal attend a church event. Further, I respectfully request the Dagio's release be modified to allow him to leave morning to attend regular church services.  5. All other conditions of release shall remain the set I declare under penalty of perjury under the laws of the true and correct.  By:  Barbara Valliere Assistant United  DATED: April 11, 2022  By:  Ashley Riser	defense counsel provided Officer Libby with all pertinent contact inform travel details, and event information.  3. Assistant United States Attorney Barbara Valliere does not object to this  4. Based on the foregoing, I respectfully request that the conditions of Mr. release be modified to allow him to leave the halfway house on April 15 attend a church event. Further, I respectfully request that the conditions of Dagio's release be modified to allow him to leave the halfway house even morning to attend regular church services.  5. All other conditions of release shall remain the same.  I declare under penalty of perjury under the laws of the United States that the fortrue and correct.  DATED: April 11, 2022 By: /s/  Barbara Valliere Assistant United States Attorney

1	[PROPOSED] ORDER				
2	Based on the foregoing, and good cause appearing:				
3	IT IS HEREBY ORDERED that the conditions of Defendant Juan Dagio's release shall				
4	be modified as follows:				
5	Mr. Dagio is permitted to leave the halfway house located at 111 Taylor Street on April 15,				
6	2022 to attend a church event. Mr. Dagio is also permitted to leave the halfway house every				
7	Sunday morning to attend regular church services.				
8	All other terms and conditions shall remain in place.				
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10	DATED:				
11	THOMAS S. HIXSON United States Magistrate Judge				
12	Cinica States Magistrate value				
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28	EX PARTE APPLICATION; [PROPOSED] ORDER				